



WINDOW COVERING
MANUFACTURERS
ASSOCIATION

December 16, 2015

George A. Borlase, Ph.D., P.E.
Assistant Executive Director for Hazard Identification and Reduction
U.S. Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Dear Mr. Borlase,

Thank you for your letter of October 28, 2015 Regarding the ANSI/WCMA A. 100.1-2014 *American National Standard for Corded Window Covering Products*. Engineers from member companies of the Window Covering Manufacturers Association also believed that the May 27 meeting with Consumer Product Safety Commission (CPSC) engineers was productive. We also appreciate the formal clarification regarding the length of the accessible operating cord proposed in your July 22, 2014 letter to me. This recommendation and others will be fully reviewed and considered as the standard is revised.

I must respectfully disagree with your statement that there has been no visible progress on reopening the standard. We announced publicly that we have initiated the process of revising the standard with a press release in October. As you are aware, there are several necessary internal steps that must be taken to reopen the standard, along with appropriate notification of ANSI. In addition, we have discussed with Health Canada the prospects of a joint development effort so that we avoid any gaps in performance requirements and effective dates of the standard in each jurisdiction. Our efforts have been delayed due to the recent Canadian elections and the subsequent change in government leadership; however, we expect to make progress now that the new government is in place. Further, WCMA is preparing to ballot the cord cleat language so that the ANSI and Canadian standards are harmonized on that performance requirement. WCMA will also ballot language to clarify the use of packaging warning labels.

The first meeting to open the revision of the voluntary standard will take place on Tuesday February 9 in Washington, D.C. As with every previous revision of the standard, we welcome CPSC staff's full participation and recommendations. We thank you for your offer to host the meeting at the CPSC National Product Test and Evaluation Center. However, we must respectfully decline. We are aware of Chairman Elliot Kaye's recent comment in a media interview that "he believes it has reached a point where we need a mandatory standard" for window coverings. WCMA strongly disagrees with this statement and, while it raises cause for concern regarding CPSC's objectivity, as we have stated CPSC staff will be invited to fully participate in the process and meetings.

An invitation will be sent to you soon to participate in the revision of the standard. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Vasami", with a long horizontal stroke extending to the right.

Ralph Vasami

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